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22 Attorneys for Plaintiffs

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28 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

14 ANGELA WILLIAMS; JANE DOE #1; JANE
15 DOE #2,

16 Plaintiffs,

17 v.

18 STEVE SISOLAK, Governor of Nevada, in his
19 official capacity; AARON FORD, Attorney
20 General of Nevada, in his official capacity;
21 THE CITY OF LAS VEGAS; CLARK
22 COUNTY; NYE COUNTY; WESTERN
23 BEST, INC. D/B/A CHICKEN RANCH;
24 WESTERN BEST LLC; JAMA RASHID;
25 MALLY MALL MUSIC, LLC; FUTURE
MUSIC, LLC; PF SOCIAL MEDIA
MANAGEMENT, LLC; E.P. SANCTUARY;
BLU MAGIC MUSIC, LLC; EXCLUSIVE
BEAUTY LOUNGE, LLC; FIRST
INVESTMENT PROPERTY, LLC; V.I.P.
ENTERTAINMENT, LLC; MP3
PRODUCTIONS, INC.; MMM
PRODUCTIONS, INC.;

CASE NO.: 2:21-cv-01676

STIPULATION AND ORDER FOR EXTENSION OF TIME TO ANSWER DEFENDANT'S MOTION TO DISMISS [DOCKET #98] AND WESTERN DEFENDANT'S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS' MOTIONS FOR PROTECTIVE ORDERS [DOCKET #2 AND DOCKET #50]

[FIRST REQUEST]

1 SHAC, LLC D/B/A SAPPHIRE
2 GENTLEMAN'S CLUB AND/OR
3 SAPPHIRE; SHAC MT, LLC; and LAS
VEGAS BISTRO, LLC D/B/A LARRY
FLYNT'S HUSTLER CLUB,

4 Defendants.

5
6 COMES NOW Plaintiffs, Angela Williams, Jane Doe #1, and Jane Doe #2, by and through
7 their counsel of record, HUTCHISON & STEFFEN, PLLC, and Defendants, Western Best, Inc
8 d/b/a Chicken Ranch and Western Best, LLC ("Defendants"), by and through their counsel of
9 record, the law firm of FOX ROTHSCHILD LLP, hereby stipulate and agree to the following
10 regarding Defendants' Motion to Dismiss filed on December 23, 2021 [Docket #98]:

11
12 1. This is the first stipulation for extension of time to file a response to Defendants'
13 Motion to Dismiss [Docket #98];
14 2. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have a two-week extension
15 to file and opposition to Defendants' Motion to Dismiss [Docket # 98], extending their
16 deadline to respond to January 20, 2022; and
17 3. The reason for the extension is Pursuant to Local Rules, Plaintiffs Angela Williams,
18 Jane Doe #1, and Jane Doe #2 have "fourteen days after service of the response" to file
19 their reply. See LR 7-2(b). Fourteen days after the service of the response is Thursday,
20 January 6, 2022. Counsel for Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe
21 #2 took an extended holiday from December 24, 2021, until January 4, 2022, to visit
22 friends and family out of state in conjunction with the Christmas and New Year's
23 holidays. Additionally, now legal counsel for Plaintiffs has not contracted COVID.
24 Accordingly, it is agreed that the above extension is agreed upon with good cause.
25 4. Defendants preserve the right to respond to Plaintiffs' Motions for Protective Orders
26 [Docket #2 and Docket #50], but will not be required to do so until the Court rules on
27 all the currently pending dispositive motions. Plaintiffs will not seek a ruling on their
28 respective Motions for Protective Orders until Defendants are permitted a reasonable

1 period of time to oppose the same.

2 **IT IS SO STIPULATED.**

3 DATED this 5th day of January, 2022.

4 **FOX ROTHSCHILD LLP**

5 */s/ Deanna L. Forbush*

6
7 Deanna L. Forbush
8 Nevada Bar No. 6646
9 Rex D. Garner
Nevada Bar No. 9401
10 John M. Orr
Nevada Bar No. 14251
11 1980 Festival Plaza Drive, Suite 700
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12 Dforbush@foxrothschild.com
Rgarner@foxrothschild.com
Jorr@foxrothschild.com

13
14 *Attorneys for Defendants Western Best, LLC*
and Western Best Inc. d/b/a Chicken Ranch

15 DATED this 5th day of January, 2022.

16 **HUTCHINSON & STEFFEN, PLLC**

17 */s/ Jason D. Guinasso*

18 Jason D. Guinasso, Esq.
Nevada Bar No. 8478
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Reno, Nevada 89511
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jguinasso@hutchlegal.com
Attorney for Plaintiffs

ORDER

2 IT IS HEREBY ORDERED that Plaintiffs, Angela Williams; Jane Doe #1; and Jane Doe
3 #2 have an extension of time for Plaintiffs to file their Response to Defendants' Motion to Dismiss
4 [Docket # 98] to **January 20, 2022.**

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10 IT IS SO ORDERED this 10th day of January, 2022.



DISTRICT COURT JUDGE

Respectfully Submitted by:

14 HUTCHISON & STEFFEN, PLLC

16 By: /s/ *Jason D. Guinasso*
17 Jason D. Guinasso
18 Nevada Bar No. 8478
HUTCHISON & STEFFEN, PLLC
5371 Kietzke Lane
Reno, NV 89511
Attorney Plaintiffs

ELECTRONIC CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022, I electronically filed a true and correct copy of the **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER DEFENDANT'S MOTION TO DISMISS [DOCKET #98] AND WESTERN DEFENDANT'S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS' MOTIONS FOR PROTECTIVE ORDERS** which was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Defendant

Steve Sisolak
Governor of Nevada

represented by **Gregory Louis Zunino**
Nevada State Attorney General's Office 100
N Carson Street Carson City, NV 89701
775-684-1137
Fax: 775-684-1108
Email: GZunino@ag.nv.gov,
sgeyer@ag.nv.gov

Defendant

Aaron Ford
Attorney General of Nevada

represented by **Gregory Louis Zunino**
(See above for address)

Defendant

The City of Las Vegas

represented by **Jeffrey L Galliher**

(See above for address)

resented by **Jeffrey L Galliher**

1 **Defendant**

2 **Clark County**

represented by **Joel K Browning**

Clark County District Attorney Civil Division
500 S. Grand Central Pkwy, #5075
Las Vegas, NV 89155-2215
702-455-4761
Fax: 702-382-5178
Email: joel.browning@clarkcountyda.com,
christine.wirt@clarkcountyda.com,
Tawana.Thomas@clarkcountyda.com

7 **Defendant**

8 **Nye County**

represented by **Brent L Ryman Erickson**

Thorpe & Swainston, Ltd.
99 W. Arroyo
P.O. Box 3559
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775-786-3930
Fax: 775-786-4160
Email: bryman@etsreno.com,
daguirre@etsreno.com, liligouri@etsreno.com

13 **Defendant**

14 Las Vegas Bistro, LLC D/B/A

15 Larry Flynt's Hustler Club

represented by **Zachary Youngsma**

c/o Deanna L. Forbush
Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
Email: dforbush@foxrothschild.com;
zach@bradshaferlaw.com

21 **Defendant**

22 Western Best Inc. D/B/A

23 Chicken Ranch

represented by **Deanna L. Forbush**

Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
Email: dforbush@foxrothschild.com

Defendant

Western Best LLC

represented by **Deanna L. Forbush**
Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
Email: dforbush@foxrothschild.com

Defendant

SHAC, LLC d/b/a Sapphire
Gentlemen's Club and/or Sapphire

Represented by:

Lewis Roca Rothgerber Christie LLP
Hughes Center
3993 Howard Hughes Parkway
Suite 600
Las Vegas, NV 89169-5996
702.474.2622
702.949.8298 (fax)
E-mail: OBrown@lrcc.com

Defendant

SHAC, MT, LLC

Represented by:

Lewis Roca Rothgerber Christie LLP
Hughes Center
3993 Howard Hughes Parkway
Suite 600
Las Vegas, NV 89169-5996
702.474.2622
702.949.8298 (fax)
E-mail: OBrown@lrcc.com

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022,
STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER
DEFENDANT'S MOTION TO DISMISS [DOCKET #98] AND WESTERN
DEFENDANT'S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS' MOTIONS
FOR PROTECTIVE ORDERS was electronically filed with the United States District Court. I
caused service via US Mail upon the following:

Defendant

Jamal Rashid
Federal Correction Instutuion
Sheridan at 27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Mally Mall Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Defendant
E.P. Sanctuary
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Recipients:
Blu Magic Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

1 **Defendant**

2 Exclusive Beauty Lounge, LLC
3 Attn: Jamal Rashid
4 Federal Correction Institution Sheridan
5 27072 SW Ballston Rd.
6 Sheridan, OR 97378
7 (Inmate #45040-509)

8 **Defendant**

9 First Investment Property LLC
10 Attn: Jamal Rashid
11 Federal Correction Institution Sheridan
12 27072 SW Ballston Rd.
13 Sheridan, OR 97378
14 (Inmate #45040-509)

15 **Defendant**

16 V.I.P Entertainment, LLC
17 Attn: Jazz A.
18 2764 N Green Valley Pkwy #400
19 Henderson, NV, 89014

20 **Defendant**

21 MP3 Productions, INC.,
22 c/o Registered Agent: Nevada Corporate Headquarters, Inc.
23 4730 S Fort Apache Rd, Suite 300,
24 Las Vegas, NV, 89147

25 **Defendant**

26 MMM Productions, INC,
27 Attn: Jamal Rashid
28 Federal Correction Instutuion
29 Sheridan at 27072 SW Ballston Rd.
30 Sheridan, OR 97378
31 (Inmate #45040-509)

32 DATED this 5th day of January, 2022

33 BY: /s/Melissa Liley

34 An Employee of Hutchison & Steffen, PLLC